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Attorneys for Defendant(s)  
THOMSON INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MATTHEW PETERSON, SADIE FLODING,  
COLIN STRUB, CARSON BRENDA, JODY  
BARRY, TEISCHA BENSON, LYNNETTA  
KLAM, and LORI DAVIES.

Plaintiff(s),

V.

THOMSON INTERNATIONAL,  
INCORPORATED, a California corporation;  
DOES 1-10, INCLUSIVE; and ROE  
ENTITIES 1-10, INCLUSIVE.

Defendant(s).

|Case No.: 1:22-cv-00701 JLT-CDB

**DECLARATION OF ROBERT L.  
SALLANDER IN SUPPORT OF  
DEFENDANT THOMSON  
INTERNATIONAL, INC.'S MOTION TO  
AMEND RULE 16 SCHEDULING ORDER**

Date: May 31, 2023

Time: 10:30 a.m.

Dept: 510 19<sup>th</sup> Street, Suite 200  
Bakersfield, CA

Judge: Magistrate, Christopher D. Baker

I, Robert L. Sallander, declare as follows:

1. I am an attorney duly licensed to practice law in all the courts of California and am the Managing Partner at Greenan, Peffer, Sallander & Lally LLP, attorneys for defendant Thomson International, Inc. (“Thomson”) in the above-captioned case.

2. This declaration is submitted in support of Thomson's Motion to Amend Rule 16 Scheduling Order.

3. I have personal knowledge of the matters set forth herein, that if called as a witness, I could testify as to each of the matters herein.

4. On September 15, 2022, Thomson served the following discovery requests upon all eight plaintiffs: (1) Interrogatories, Set One; and (2) Request for Production of Documents, Set One.

5. Starting November 10, 2022, Thomson sent out authorizations to plaintiffs to release their records from their medical providers, employers, Food & Drug Administration (“FDA”), Centers for Disease Control and Prevention (“CDC”), and state and county public health agencies, and has sent out all records requests after receipt of authorizations.

6. Despite Thomson's diligence, 33 records are still outstanding.

7. On April 19, 2023, I met & conferred with plaintiff counsel Lindsay Lien Rinholen concerning extending deadlines. Plaintiff counsel refused to extend the trial date.

8. On April 24, 2023, my office contacted the court concerning scheduling a hearing for motion to amend schedule.

9. Thomson noticed depositions of plaintiffs for May 12, May 15-17, 2023 to preserve rights, but will not be able to take meaningful depositions without the outstanding records.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 26<sup>th</sup> day of April, 2023 in San Ramon, California.



Robert L. Sallander